Continental’s submission of  document titled “EOBR\_TelematicsRisks\_1.0 “ has many statements that are inaccurate. There are exaggerations in many of the statements on items that have been discussed in detail within the MCSAC subcommittee. I have included comments of the statements below from Submitted Documents from Continental.

**Risks and Problems associated with a Telematic Approach for Log Downloads for EOBRs.**

**2. SUMMARY**  ***Furthermore, Continental strongly recommends the separation of legal EOBR and commercial Fleet Management Systems (FMS) requirements.***

*There is separation in the applications for security and regulatory compliance in the currently implemented systems.  The fact is that there is a minimization of cost by using devices and features in a Fleet Management System that are required to be compliant such as GPS, ECM Connectivity, Process, Memory, and Driver Entry device.   The Fleet Management Systems having this functionality keep cost to implement minimized and none of these drive the regulation from the supplier standpoint. The regulation is the regulation to be in compliance.*

**3.1 Lack of data integrity protection**

             -*Within the EOBR Host System*: it would easily be possible to modify driving records to

either increase the available driving time or to avoid infringement detection.

              ‐ *Within the Enforcement System*: main risk due to human error or system errors.

              ‐ *Within the Roadside Enforcement Device*: main risk due to human error or system

errors

*The above comment attacks the integrity of the systems in place that all have past many DOT audits both at roadside and at the Carrier. This additionally identifies complete lack of understanding of the systems that have been implemented some of which as long as 18 years in the field.  These items that are considered a lack of integrity are all requirements to meet in the current regulation.*

**3.2 Lack of authenticity of data**

*Statements made by Continental is this paragraph additionally indicated that there was no comprehension or understanding in the proposed methodology and process as defined in the session held October 24-27 that had interaction with enforcement to insure that the EOBR information did in fact have keys and integrity of what device the information came from.*

**3.6 Availability of wireless network**

*Fleet Management Systems are extremely sensitive to the availability of wireless networks, not as Continental has stated. Many systems have multiple wireless networks or enhanced there wireless network with US  and Canada ubiquitous wireless*

*coverage to insure that messages, load plans, regulatory and emergency*

*communications are available.  There is no perfect wireless network I am addressing the*

*inaccuracies made and lack of understanding that Continental makes in public*

*documents.*

**3.8 Transaction and communication costs**

*Continental has no facts indicated and has not listened to any communications that have been addressed in the MCSAC meetings and obviously no experience in wireless communication plans to indicate that the cost for the use “significant Costs” to implement.*

*The frequency of inspection on EOBRs may increase but, with wireless plans that have been in place for years it is a fraction of the total wireless plan usage and update transactions are currently being comprehended in these plans. As a supplier I will not submit proprietary costs due to NDA requirements but, can insure you the cost is insignificant, not as depicted.*

Comments are being made on the literal statements as made in the document.We continue to revisit these issues over and over and wasting productivity to solve core issues.  We need a process to not allow inaccurate statements being made that totally distracts from the objective tasks. If there is a point to be made for Peer-to-Peer in all of this it is getting camouflaged by inaccuracies in the supporting documents submitted. All the suppliers are asking for is specifications to move forward with a compliant device to implement which I have stated many times in the meetings.  If the specification is going to increase cost we will indicated that and have on particular issues. We want an industry specification, from XATA Corp standpoint, that can be implemented for the Carrier and Enforcement for the increase of Safety on the roads. Again I am compelled to submit this document to have accurate information available.

|  |
| --- |
| **Thomas G Cuthbertson** VP XATANET Development [Tom.Cuthbertson@Xata.com](mailto:Tom.Cuthbertson@Xata.com)   **Xata Corporation** 965 Prairie Center Drive Eden Prairie, MN 55344 o 800.796.9282 c 703.801.2419 [www.xata.com](http://www.xata.com/) |